

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY L. HUGHES,)	Case No. 08 C 1360
)	
Plaintiff,)	Judge Conlon
)	
v.)	Magistrate Judge Keys
)	
THE SUN TIMES COMPANY, a Delaware)	
corporation,)	
)	
Defendant.)	

AGREED MOTION FOR EXTENSION OF THE DISPOSITIVE MOTION DEADLINE

Defendant the Sun-Times News Group (“Sun-Times”) and Plaintiff Anthony Hughes (“Hughes”) move for a thirty day extension of the dispositive motion deadline. In support of their motion, the parties state:

1. Currently, all dispositive motions are due on or before Monday, August 11, 2008.
2. The parties worked diligently through discovery by the original August 11, 2008 deadline, including the exchange of Rule 26(a) disclosures, written document requests and responses, and written interrogatories and responses. The parties cooperated and worked diligently through discovery even though Plaintiff’s counsel suffered from a serious illness that required hospitalization and necessitated that he be out of the office for a substantial period of time during the discovery process.
3. In light of Plaintiff’s counsel’s legitimate need to be out of the office for a substantial period of time, Defendant agreed to extend the deadlines for Plaintiff’s written discovery responses. The parties also agreed to schedule Plaintiff’s deposition for a time after Plaintiff’s counsel was back in the office and able to complete Plaintiff’s written discovery responses.

4. Specifically, the parties agreed to conduct Plaintiff's deposition on July 14, 2008. Plaintiff's notice of deposition was served on June 23, 2008. On July 10, 2008, Plaintiff's counsel requested a continuance of Plaintiff's deposition due to a scheduling conflict and the need for additional time to respond to Defendant's written discovery requests. Defendant agreed to Plaintiff's request and the parties rescheduled Plaintiff's deposition for August 21, 2008.

5. On July 29, 2008, Defense counsel contacted Plaintiff's counsel to discuss a short extension of the dispositive motion deadline so that Plaintiff could be deposed. Plaintiff's counsel agreed to a thirty day extension of the dispositive motion deadline.

6. This is the parties' first request for an extension of time, and it is being made well in advance of the August 11, 2008 dispositive motions deadline. This request is not being made solely for purposes of delay, but in good faith owing to the parties need for additional time to depose Plaintiff and prepare any dispositive motions.

WHEREFORE, the parties respectfully request that the Court grant them additional time until and including September 11, 2008 to depose the Plaintiff and file any dispositive motions.

Respectfully submitted,

THE SUN-TIMES NEWS GROUP,

By: s/ Jason M. Torres
One of Its Attorneys

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July 30, 2008

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused a copy of the parties' AGREED MOTION FOR AN EXTENSION OF THE DISPOSITIVE MOTIONS DEADLINE to be served electronically in the Unites States District Court for the Northern District of Illinois on this 30th day of July 2008:

s/ Jason M. Torres